1 2	Christopher R.A. Morray-Jones, SBN 256726 LAW OFFICES OF C. MORRAY-JONES 1611 Telegraph Avenue, Suite 910 Oakland, CA 94612 Telephone: (510) 444-0151 Ecocionida (510) 444-0150				
3					
4	Facsimile: (510) 444-0150 Email: cm-j@m-jlaw.com				
5	Attorney for Plaintiff Jose Bermudez				
6	Zach Cowan, City Attorney, SBN 96372 Matthew J. Orebic, Deputy City Attorney, SBN	124491			
7	BERKELEY CITY ATTORNEY'S OFFICE 2180 Milvia Street, Fourth Floor	121171			
8	Berkeley, CA 94704 Telephone: (510) 981-6998				
9	Facsimile: (510) 981-6960 Email: Morebic@ci.berkeley.ca.us				
10	Attorneys for Defendants City of Berkeley, Former Officer Roderick Roe, Officer John Jones				
11	and Former Chief Douglas Hambleton				
12	Ross E. Lampe, SBN 172336 Marcell P. Neri, SBN 258537 MURO & LAMPE, INC. 75 Iron Point Circle, Suite 155 Folsom, CA 95630 Telephone: (916) 817-6300				
13					
14					
15	Facsimile: (916) 817-6355				
16	Email: Ross.Lampe@muro-lampe.com, Marcell.Neri@muro-lampe.com Attorneys for Defendants Berkeley Bowl Produce, Inc., Tosha Anderson, and David Craib				
17	UNITED STATES DISTRICT COURT				
18		ICT OF CALIFORNIA			
19	JOSE BERMUDEZ Plaintiff,	No. C10 02893 CW (ADR)			
20	V.	STIPULATION AND ORDER TO ADD			
21	CITY OF BERKELEY; OFFICER	PARTIES TO PROTECTIVE ORDER			
22	RODERICK ROE # 81 in his capacity as an individual; OFFICER JOHN JONES # 5 in his				
23	capacity as an individual; FORMER CHIEF				
24	OF POLICE DOUGLAS N. HAMBLETON in his official capacity and in his capacity as an				
25	individual; BERKELEY BOWL PRODUCE, INC.; TOSHA ANDERSON in her capacity as				
26	an individual; DAVID CRAIB in his capacity as an individual; and DOES 1-100,				
27	Defendants.				
28					

1	The Parties hereby stipulate as follows:		
2	1.	On January 14, 2011, this Court issued a Protective Order covering confidential	
3		information qualified for protection under standards developed pursuant to Fed. R.	
4		Civ. P. 26(c).	
5	2.	The said Order was entered pursuant to stipulation by Plaintiff JOSE BERMUDEZ,	
6		by, through and together with his attorney CHRISTOPHER R.A.MORRAY-JONES,	
7		and Defendants CITY OF BERKELEY, FORMER OFFICER RODERICK ROE,	
8		OFFICER JOHN JONES, and FORMER CHIEF OF POLICE DOUGLAS N.	
9		HAMBLETON, by, through and together with their attorneys ZACH COWAN, City	
10		Attorney, and MATTHEW J. OREBIC, Deputy City Attorney for the City of	
11		Berkeley.	
12	3.	Clause 11 of the said Order states that "[t]his Order shall apply equally to any Party	
13		to this litigation whose attorney agrees in writing to be bound hereby."	
14	4.	Defendants BERKELEY BOWL PRODUCE, INC., TOSHA ANDERSON and	
15		DAVID CRAIB, by, through and together with their attorneys ROSS E. LAMPE and	
16		MARCELL P. NERI, hereby stipulate and agree to be bound by all of the terms and	
17		provisions of the said Protective Order without reservation or exception.	
18	5.	All Parties named herein, by, through and together with their attorneys, hereby	
19		stipulate that the said Protective Order shall apply equally to all of the said Parties	
20		and their attorneys.	
21			
22	Dated: Jan	uary 18, 2011 LAW OFFICES OF C. MORRAY-JONES	
23			
24		By: /s/ C.R.A. Morray-Jones	
25		CHRISTOPHER R.A. MORRAY-JONES Attorney for Plaintiff	
26		JOSE BERMUDEZ	
27			
28			

Case 4:10-cv-02893-CW Document 30 Filed 01/24/11 Page 3 of 3

1	Dated: January 18, 2011	ZACH COWAN, CITY ATTORNEY
2		MATTHEW J. OREBIC, Deputy City Attorney
3		Dec. /s/Mettlesser I Ovels
4		By: /s/ Matthew J. Orebic MATTHEW J. OREBIC Attornaya for Defendants
5		Attorneys for Defendants CITY OF BERKELEY, FORMER OFFICER RODERICK ROE. OFFICER JOHN JONES,
6		AND FORMER CHIEF DOUGLAS N. HAMBLETON
7		HAMBLETON
8		
9	Dated: January 18, 2011	ROSS E. LAMPE MARCELL P. NERI
10		WIMCELL I. NEKI
11		By: /s/Ross F. Lampe
12		By: /s/ Ross E. Lampe ROSS E. LAMPE Attorneys for Defendants
13		BERKELEY BOWL PRODUCE, INC., TOSHA ANDERSON, and DAVID CRAIB
14		TOSTITTI (BERSOT), and ETTY IE CITATE
15		
16		
17		
18	PURSUANT TO STIPULATION, IT IS SO ORDERED.	
19		0
20	Dated: <u>1/24/2011</u>	CHAUDIA WILKEN
21		Judge, United States District Court
22		
23		
24		
25		
2627		
28		
۷٥		
		3